

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

**NATIONAL RIFLE ASSOCIATION OF
AMERICA,**

Plaintiff,

V.

ANDREW CUOMO, both individually and in his official capacity; MARIA T. VULLO, both individually and in her official capacity; and THE NEW YORK STATE DEPARTMENT OF FINANCIAL SERVICES,

Defendants.

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**CIVIL CASE NO. 18-CV-00566-TJM-
CFH**

**NOTICE OF RENEWED MOTION BY
PLAINTIFF TO COMPEL THE
PRODUCTION OF DOCUMENTS**

PLEASE TAKE NOTICE that pursuant to Rule 45 of the Federal Rules of Civil Procedure and upon the annexed Declaration of Sarah B. Rogers in Support of Plaintiff's Renewed Motion to Compel the Production of Documents (the "Motion"), dated April 23, 2021, and all attachments thereto, the accompanying memorandum of law, and all other papers and proceedings in this matter, Plaintiff National Rifle Association of America (the "NRA"), by their undersigned counsel of record, hereby moves this Court before the Honorable Christian F. Hummel, in the United States District Court, Northern District of New York, Albany, New York, for an order: (1) granting this Motion; (2) overruling Everytown's objections; (3) requiring Everytown to produce all responsive documents within seven (7) days; (4) overruling all of Everytown's asserted privileges; (5) requiring production of all documents withheld on the basis of any privilege; (6) awarding the NRA its reasonable attorneys' fees and costs in bringing this motion; and (7) awarding the NRA all other appropriate relief. On March 26, 2021, this Court held a discovery hearing, during which the Court denied the NRA's motion to compel Everytown filed on August 27, 2020 (Dkt. No. 251)

without prejudice, and directed the NRA to file a renewed motion to compel (Dkt. No. 328). Thus, the NRA hereby renews its motion in accordance with this Court's direction.

Dated: April 23, 2021

Respectfully submitted,

By: Sarah B. Rogers

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**ATTORNEYS FOR THE NATIONAL RIFLE
ASSOCIATION OF AMERICA**

CERTIFICATE OF SERVICE

I certify that on April 23, 2021, I caused the following: (1) Notice of Motion by Plaintiff to compel the production of documents; (2) Declaration of Sarah B. Rogers in support of Plaintiff's Motion to Compel the production of documents; and (3) Memorandum of Law in support of Plaintiff's Motion to Compel the production of documents, to be served on the below counsel of record via the Court's electronic notification system in accordance with the Federal Rules of Civil Procedure:

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Sarah B. Rogers
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